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8 UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
NORTHERN DIVISION

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11 In re) Bk. No. 9:19-bk-11573-MB
12 HVI Cat Canyon, Inc.,) Chapter 13
13 Debtor.)
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COMMENTS RE SEVENTH
AMENDMENT TO CREDIT
AGREEMENT AND STATUS HEARING

Date: May 19, 2020
Time: 10:30 a.m.
Place: 1415 State Street
Courtroom 201
Santa Barbara, CA 93101

To the Honorable Martin Barash:

The Trustee filed a Seventh Amendment to the Credit Agreement. It appears at the end of this period there will be no further economic activity in this case. Before all cash in the case is depleted, Creditor GRL, LLC requests that the Trustee establish that he will abide by the Court Order requiring him to escrow all royalties payable to GRL, LLC. Although there is a line item for "royalties", that line item is insufficient to fund the shortfall in the escrow account through February, as well as the royalties payable for March, April and May. The Trustee has never accounted for or explained, formally or informally, the \$41,969.95 difference between the amount he deposited for August through November 2019 and the Debtor's books, he never deposited the \$10,245.47 owing for January, 2020 and he has made neither accounting nor payment for royalties owe for March, April or May of 2020.

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2 As far as the Status Conference is concerned, GLR, LLC would like to hear from the Trustee what
3 his plans are for selling the assets of the estate, as this is the period of time the Trustee has suggested would
4 be appropriate for a sale.

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Dated: 5/14, 2020

BEALL & BURKHARDT, APC

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By: William C. Beall
William C. Beall, Counsel for GRL, LLC

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1114 State Street, Suite 200, Santa Barbara, CA 93101

A true and correct copy of the foregoing document entitled (specify):

COMMENTS RE SEVENTH AMENDMENT TO CREDIT AGREEMENT AND STATUS HEARING

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 5/14/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Anthony A Austin anthony.austin@doj.ca.gov
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) ___, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) ___, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

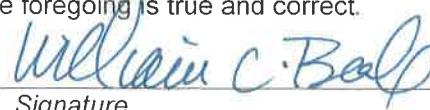
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/14/2020

William C. Beall

Date

Printed Name


Signature